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DEPARTMENT OF THE NAVY

NAVY ENVIRONMENTAL HEALTH CENTER
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24 APR 1995

From: Commanding Officer, Navy Environmental Health Center
To: Commander, Atlantic Division, Naval Facilities Engineering
Command, Attn: Art Wells, 1510 Gilbert Street, Norfolk,
VA 23511-2699

Subj: MEDICAL REVIEW OF INSTALLATION RESTORATION PROGRAM
DOCUMENTS FOR NAVAL STATION ROOSEVELT ROADS, PUERTO RICO

Ref: (a) LANTNAVFACENGCOM memo of 27 Mar 95

Encl: (1) Health and Safety Plan Review
(2) Medical/Health Comments Survey

1. As you requested in reference (a), we completed a medical review of the "Draft Health and Safety Plan, RCRA Facility Investigation, Naval Station Roosevelt Roads, Puerto Rico." Our comments are provided in enclosure (1).
2. Please complete and return enclosure (2). Your comments are needed to continually improve our services to you.
3. We are available to discuss the enclosed information by telephone with you and, if necessary, with you and your contractor. If you require additional assistance, please call Ms. Mary Ann Simmons at (804) 444-7575 or DSN 564-7575, extension 402.

A handwritten signature in cursive script, appearing to read "Y. P. Walker", is written above the typed name.

Y. P. WALKER
By direction

HEALTH AND SAFETY PLAN REVIEW

Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) Navy/Marine Corps Installation Restoration Manual (February 1992)

General Comments:

1. The "RCRA Facility Investigation, Naval Station Roosevelt Roads, Puerto Rico, Contract N62470-89-D-4814, Contract Task Order 0223," was prepared for LANTNAVFACENGCOM by Baker Environmental, Inc., and forwarded to the Navy Environmental Health Center on 27 March 1995. The document was dated 30 March 1995.
2. The method for the review is to compare the health and safety plan (HASP) to federal requirements under OSHA regulations and to Department of the Navy requirements under the "Navy/Marine Corps Installation Restoration Manual" (see references (a) and (b) above). We noted deviations and/or differences in the plan from these two primary references. A list of acronyms used in our comments is included as Attachment (1).
3. The points of contact for review of the HASP are Ms. Mary Ann Simmons, Industrial Hygienist, or Mr. Donald Coons, Physical Science Technician, who may be reached at (804) 444-7575, or DSN 564-7575, extensions 402 or 334, respectively.

Specific Comments:

1. Page 3-25, Subsection 3.4.1, "Chemical Hazards":

a. The list of chemicals in this section is not consistent with the information in the site descriptions found in Section 3.3, "Description of Areas Under Investigation." For example, various types of metals are noted in several of the descriptions, (Solid Waste Management Units (SWMUs) 5, 6, and 16), and yet no metals appear in this list of chemical hazards. Also, this list does not contain any information for SWMUs 1, 2, 13, 46, or 51. Finally, the list is not consistent with the other lists of chemicals found in Table 3-1, "Chemical/Physical Properties of Constituents Detected During Previous Sampling at NSRR," and in Table 3-2, "Chemical Exposure Information for Constituents Detected During Previous Sampling at NSRR." We recommend revising the plan so that the chemical listings are consistent throughout.

b. Some chemicals listed on page 3-25 have an asterisk (*) notation to show that chemical/materials safety data sheets are not being provided. For the most part the chemicals so noted are actually groups of chemicals, for example, "Paint/Adhesives," "Waste Solvents/Fuels," and "Spent Batteries/Battery Acid." If it is not possible to obtain an MSDS, we recommend providing a summary of the general hazards, precautions and symptoms of overexposure associated with each category.

Enclosure (1)

2. Page 3-26, Subsection 3.4.2, "Physical Hazards": The hazards of ordnance and unidentified drums, noted in several site descriptions in Section 3.3, are not included in this section.

3. Page 3-31, "Task-Specific Hazards": The task of "drum sampling" is not included in this section. It is, however, listed later in the plan in Section 6.2, "Site-Specific Levels of Protection." It is not clear if drums will or will not be sampled. The final plan should be revised to reflect consistent task descriptions throughout.

4. Page 5-1, Section 5.0, "Environmental Monitoring":

a. Additional sampling methods to evaluate site contaminants other than those measured by a photoionization device (PID) need to be included. For example, PCBs, metals and pesticides cannot be detected by the PID and are all listed in Table 3-1, "Chemical/Physical Properties of Constituents Detected During Previous Sampling at NSRR," and in Table 3-2, "Chemical Exposure Information for Constituents Detected During Previous Sampling at NSRR."

b. Subsection 5.1, "Personal Monitoring":

(1) Action levels for materials other than those measured by the PID should be established and included in the final plan.

(2) Explain the usefulness of the results of the colorimetric tube for "phosphoric acid esters" since this chemical group is not listed as a site contaminant. If it is a suspected site contaminant, it should be noted in at least one of the SWMU descriptions as well as other sections of the plan as appropriate.

c. Subsection 5.2, "Point Source Monitoring": Since many site contaminants may be in the soil, consider using a direct reading dust monitor.

d. Subsection 5.5, "Equipment Maintenance and Calibration": We recommend calibrating equipment before and after each period of use according to manufacturer's instructions and standard industrial hygiene practice.

5. Table 9-1, "OSHA Training History of Baker Project Personnel": The training dates provided for the two Baker Environmental employees, C. Boes and B. Cummings, showed that they need refresher training before site work commences.

6. Figure 8-1, "Emergency Telephone Numbers": Consider revising the listing for the U.S. Coast Guard's "National Response Center" to that for their Marine Safety Officer, in San Juan.

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
AG:	Acid Gas
ANSI:	American National Standards Institute
ATSDR:	Agency for Toxic Substances and Disease Registry
BBP:	Bloodborne Pathogen Program
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HASP:	Health and Safety Plan
HBV:	Hepatitis B Virus
HIV:	Human Immunodeficiency Virus
IDLH:	Immediately Dangerous to Life and Health
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NIOSH:	National Institute for Occupational Safety and Health
NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value

FROM: _____
 (YOUR NAME/COMMAND)
 TO: NAVENVIRHLTHCEN, ENVIRONMENTAL PROGRAMS
 FAX: COM: (804) 444-7261/DSN: 564-7261

MEDICAL/HEALTH COMMENTS - YOUR VIEW

Please help us improve our review process by indicating the extent to which you agree or disagree about the comments we provided for to your activity.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
1. "Value added" to IR/BRAC process?	1	2	3	4	5
2. Received in a timely manner?	1	2	3	4	5
3. High level of technical expertise?	1	2	3	4	5
4. Very useful to the RPM?	1	2	3	4	5
5. Contractor incorporated comments?	1	2	3	4	5
6. Easily readable/useful format?	1	2	3	4	5
7. Overall review was of high quality?	1	2	3	4	5
8. NAVENVIRHLTHCEN was easily accessible?	1	2	3	4	5
9. NAVENVIRHLTHCEN input during scoping or workplan development would be "value added"?	1	2	3	4	5
10. Added involvement in IR/BRAC document needed?	1	2	3	4	5

Please return by fax using the box provided at the top of this page. If you have any other comments, please list them below or telephone Ms. Mary Ann Simmons, Industrial Hygienist at (804) 444-7575, DSN 564, extension 402, at any time to discuss your viewpoint. As our customer, your comments and suggestions of how we can improve our services to you are important!